UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND GREENBELT DIVISION

KENYON DEVON AMES,)	
)	
Plaintiff,)	
)	
V.)	Case No. 8:25-cv-01585-DLB
)	
ENTERPRISE RAC COMPANY)	
OF MARYLAND, LLC)	
)	
Defendant.)	
)	

DEFENDANT'S STATEMENT PURSUANT TO AMENDED STANDING ORDER 2021-13

Pursuant to the Court's Amended Standing Order 2021-13 (Dkt No. 6), Defendant Enterprise RAC Company Maryland, LLC ("Defendant") states as follows:

- Defendant was served with Plaintiff's state court Summons and Complaint on April
 2025.
- 2. In this action, this Court has both federal question jurisdiction, as claims have been alleged under three federal statutes (42 U.S.C. § 1981, 42 U.S.C. § 2000e, and 29 U.S.C. § 660(c)), and diversity jurisdiction. Diversity jurisdiction exists because no party is a citizen of Maryland: Plaintiff is a citizen of Virginia and Defendant is a citizen of Missouri because it is a limited liability company comprised of sole member Enterprise Holdings, Inc., an entity incorporated in Missouri and with its principal place of business in Missouri.
- 3. In this action, removal took place on May 16, 2025, which was thirty (30) days after Defendant was first served with the Summons and Complaint.
- 4. The action in state court was not commenced more than one year before the date of removal.

5. There are no defendants other than Defendant Enterprise RAC Company Maryland,

LLC, and thus no additional defendants were served prior to the time of removal.

Date: May 29, 2025 Respectfully submitted,

/s/ Edward Lee Isler

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Attorneys for Defendant Enterprise RAC Company of Maryland, LLC

CERTIFICATE OF SERVICE

I certify that on this 29th day of May 2025, I caused a true and correct copy of the foregoing to be sent by United States mail and electronic mail to Plaintiff as follows:

Kenyon Devon Ames 1021 Elden Street Herndon, VA 20170 kinghallmark@aol.com

Pro Se Plaintiff

/s/ Edward Lee Isler

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